



Central Telephone, Inc.

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DEC 8 2004

FCC - MAILROOM

December 6, 2004 P.O. Box 25 • Goldendale, WA 98620 • (509) 773-4472 • Fax (509) 773-6113

EX PARTE COMMUNICATION

ORIGINAL

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

EX PARTE OR LATE FILED

Re: Access to Unbundled Network Elements, WC Docket No. 03-225

Dear Marlene Dortch:

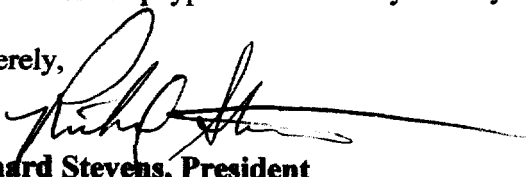
I am writing to urge you, in taking action on the pending revision of the Unbundled Network Element (UNE) rules, to ensure that payphone companies like mine continue to have competitive alternatives for their local service needs.

As the Commission has long recognized, payphones play a critical role in meeting the needs of the public for communications on the move – especially in emergencies and in disasters such as 9/11. And for many citizens, payphones are the only telephones they can use. That is why Congress mandated wide availability of service in the Telecommunications Act. To continue in providing payphone services, my company must have reliable local service connections at a reasonable cost. This is so because my local phone bill is my single largest monthly cost of operating my phones. To keep service quality high and costs low, we rely on the availability of competitive telephone companies for local service. Without competitive local service options like UNE-P, there is no market check on what we may be charged by the incumbent telephone company. My Company currently has approximately 2500 payphones in Washington and Oregon, of which half of them are on UNEP lines. We have in the last year pulled around 500 lines that were no longer profitable to keep in and if UNEP goes away we will have to pull many more.

For our payphones, the only competitive alternative that has proved effective to date is UNE-P. Our payphones do not transmit data and do not need broadband channels; thus, broadband facilities do not provide a viable competitive alternative for our payphones. In the last few years, we have had to remove a large number of our payphones from service because their revenue was insufficient to meet operating costs. Without UNE-P, the American public is sure to lose more of the valuable payphone services they need and rely on today.

Therefore, I urge you to take steps to ensure that the FCC's revised UNE rules preserve competitive local service alternatives for payphones. Thank you for your consideration.

Sincerely,

**Richard Stevens, President**No. of Copies rec'd
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cc:

Representatives: Jay Inslee, Rick Larsen, Brian Baird, Doc Hastings, Greg Nethercutt, Norman Dicks, Jim McDermott, Jennifer Dunn, Adam Smith, David Wu, Greg Walden, Earl Blumenauer, Peter Defazio and Darlene Hooley.

Senators: Gordon Smith, Ron Wyden, Maria Cantwell and Patty Murray